

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND**

**TRUSTEES OF THE NATIONAL AUTOMATIC
SPRINKLER INDUSTRY WELFARE FUND, et al.,**

Plaintiffs,

V.

**BILL R. SHEEHE d/b/a ALL STAR FIRE
PROTECTION,**

Defendants.

[illegible]

) C.A. NO.: DKC-11-0365

MOTION FOR ENTRY OF DEFAULT JUDGMENT

COME NOW Plaintiffs, by and through their attorneys, O'Donoghue & O'Donoghue LLP, requests the Clerk of the Court to enter Judgment by Default as follows:

1. That Plaintiffs have Judgment against the Defendants for contributions in the amount of \$177,039.42 owed for the months of January 2009 through July 2010.
2. That Plaintiffs have Judgment against the Defendant for liquidated damages owed in the amount of \$35,407.88 assessed on late contributions for the months of January 2009 through July 2010.
3. That Plaintiffs have Judgment against the Defendant for costs of \$350.00, attorneys' fees of \$781.50 and interest in the amount of \$24,595.24 assessed through July 21, 2011 and continuing to accrue through the date of payment. These amounts are owed pursuant to 29 U.S.C. §1132(g), the Restated Agreements and Declarations of Trust establishing the NASI Funds (hereinafter "Trust Agreements") and the Guidelines for Participation in the NASI Funds (hereinafter "Guidelines").

4. The basis of this Motion is set forth in the attached Memorandum.

Respectfully submitted,

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A handwritten signature in cursive script, reading "Charles W. Gilligan", followed by a horizontal line and the date "1/17/11".

Charles W. Gilligan

Maryland Bar Number 05682

Attorney for Plaintiffs

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